



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 19, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government respectfully submits this letter regarding Government exhibits admitted during the course of the trial. The Government and the defense have conferred and agree that the following Government exhibits can be released to the public:

GX-1-B-R
GX-1-J-R
GX-1-K-R
GX-1-M-R
GX-1-O-R
GX-1-P-R
GX-2-C-R
GX-2-D-R
GX-2-E-R
GX-2-F-R
GX-2-G-R

GX-2-H-R
GX-2-I-R
GX-2-J-R
GX-2-K-R
GX-2-L-R
GX-2-M-R
GX-2-N-R
GX-2-O-R
GX-2-P-R
GX-2-Q-R
GX-2-R-R
GX-2-S-R
GX-2-T-R
GX-2-U-R
GX-2-V-R
GX-3-AA-R
GX-3-B-R
GX-3-BB-R
GX-3-C-R
GX-3-CC-R
GX-3-D-R
GX-3-E-R
GX-3-F-R
GX-3-FF-R
GX-3-G-R
GX-3-GG-R
GX-3-H-R
GX-3-HH-R
GX-3-I-R
GX-3-II-R
GX-3-J-R
GX-3-JJ-R
GX-3-K-R
GX-3-KK-R
GX-3-L-R
GX-3-M-R
GX-3-N-R
GX-3-O-R
GX-3-P-R
GX-3-Q-R
GX-3-R-R

GX-3-T-R
GX-3-U-R
GX-3-V-R
GX-3-W-R
GX-3-X-R
GX-3-Y-R
GX-3-Z-R
GX-296-RR

The following Government exhibits were temporarily admitted under seal so that the parties had an opportunity to consider the need for redactions. The Government has reviewed the following exhibits and determined that no redactions are necessary and therefore can be released to the public:

GX-1-C
GX-2-W
GX-3-DD
GX-3-EE
GX-3-S

The Government further notes that after conferring with the defense about GX 603 and GX 604, which are public exhibits, and defense exhibit AF-1, the parties have reached agreement about redactions for those exhibits. Accordingly, the Government is submitting GX 603-A, which is a less redacted version of GX 603, into evidence as a public exhibit. The Government is also submitting GX 604-A, which is an unredacted version of GX 604, into evidence under seal to protect the privacy of third parties who are named in the exhibit. The Government understands that the defense will submit a redacted version of DX AF-1 that matches the redactions in the final versions of GX 603-A and GX 604-A.

Before the jury begins deliberating, the Government asks that the Court so-order this letter, which (1) offers GX 603-A and 604-A into evidence, and (2) proposes releasing versions of various

other Government exhibits listed above. The Government is submitting to the Court GX 603-A and GX 604-A under temporary seal until the Court rules on this request, and will provide a copy of the remaining exhibits referenced in this letter tomorrow morning.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: s/ _____
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Cc: Defense Counsel (by ECF)